

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

C. Alan Neeper and Jayne Ellen Neeper  
fka Jayne Ellen Hoke

Debtors

Specialized Loan Servicing LLC, as  
servicer for Deutsche Bank National  
Trust Company, as Trustee for HIS  
Asset Securitization Corporation  
Trust 2006-WMCI, Mortgage  
Pass-Through Certificates, Series  
2006-WMCI

Movant

v.

C. Alan Neeper and Jayne Ellen Neeper  
fka Jayne Ellen Hoke

Respondents

Chapter 13

1:17-bk-02607-HWV

Answer

---

**ANSWER**

**AND NOW**, this 14<sup>th</sup> day of March 2018, the Debtors, C. Alan Neeper and Jayne Ellen Neeper, by and through counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by Specialized Loan Servicing LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for HIS Asset Securitization Corporation Trust 2006-WMCI, Mortgage Pass-Through Certificates, Series 2006-WMCI, and states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted in part; Denied in part. Debtors believe they are only three months behind but this default was as a result of an undiagnosed medical condition suffered by Debtor Alan Neeper who was recently diagnosed with Postural Orthostatic Tachycardia Syndrome. This disease caused Mr. Neeper to have very low blood pressure, which in turn made it difficult for him to maintain consciousness. As such, he was unable to work and was even considering filing for disability. However, he is now taking medication that increases his

blood pressure and he is feeling significantly better and is able to work full time. Debtors would like to be able to roll these mortgage arrears into an amended plan.

8. Admitted.

9. Admitted.

**WHEREFORE**, the Debtors respectfully requests this Honorable Court dismiss the complaint and/or allow Debtors to cure the default in an amended Plan.

Respectfully Submitted,

Date: March 14, 2018

By: **/s/ Dawn M. Cutaia**

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